

August 12, 2022

Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Chambers Room 750  
New York, New York 10007-1312

Via ECF Only

Re: C.H. Robinson Worldwide, Inc. v. Produce Depot USA, LLC, et al.  
U.S. District Court, S.D. New York; Case No. 1:21-cv-07939-ALC-KHP

Prometo Produce Corp. v. Produce Depot USA, LLC, et al.  
U.S. District Court, S.D. New York; Case No. 1:21-cv-06131-PGG-KHP

Dear Judge Parker:

The counsel below represent the parties in the above-captioned civil cases referred to Your Honor for general pretrial matters and for Settlement Conferences which were held on various dates in February, March and April and which culminated in a global settlement on May 3, 2022. This correspondence constitutes the parties' monthly Joint Status Letter in compliance with the Court's respective Orders Staying Case (C.H. Robinson Case, Doc. No. 54; Prometo Produce Case, Doc. No. 92).

Since our last status report to the Court on July 14, 2022, the Rule 9019 Motion to Approve Compromise and Settlement with PACA Trust Creditors ("Motion") came on for hearing in Newark, NJ on August 2, 2022 before U.S. Bankruptcy Judge Vincent F. Papalia. The Motion was heard and continued. Judge Papalia requested a more complete certificate of service upon all creditors and parties in interest and, further, requested supplemental briefing on the scope of the PACA trust. These new filings are due on August 16, 2022, with an adjourned hearing date of September 13, 2022 at 10:00am.

Counsel will continue to keep Your Honor updated, with the next Joint Status Letter due on or before September 15, 2022.

Thank you.

Respectfully submitted,

/s/ Mark A. Amendola

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